

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 12-03045-01-CR-S-RED

CHARLES FREDERICK WHITE,

Defendant.

MOTION TO DISCLOSE ELECTRONIC SURVEILLANCE

COMES NOW defendant Charles F. White by and through counsel and pursuant to 18 U.S.C. sec 3504 moves the Court for an order requiring the government to disclose electronic surveillance on this defendant. As a basis for this motion defendant states that according to article in the Kansas City Star the Missouri Highway Patrol conducts surveillance on Green Circle Hydroponic store located at 12 East Missouri Avenue Kansas City, Missouri to identify the stores customers and then relays this information to law enforcement in the counties where the customer resides. That the information used to obtain searches of the customers residence. That this defendant has been at the Green Circle Hydroponic store to shop and has reason to believe that his name and personal information was obtained by the Missouri Highway Patrol, and has led to unlawful electronic surveillance of him and his residence.

WHEREFORE, Defendant moves the Court to order the government to produce all records of electronic surveillance and for such other and further relief as the Court deems proper.

Respectfully Submitted,

/s/ Roger C. Jones

Roger C. Jones #35415
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on June 13, 2013 to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Roger C. Jones

Roger C. Jones #35415
ATTORNEY FOR DEFENDANT